



13. MBI is a taxpayer-funded religious college.
14. MBI maintains a statement on human sexuality in its student handbook. It states: “[W]e conclude that non-marital sex, homosexual sex, same-sex romantic relationships, and transgender expressions are deviations from God’s standard, misrepresenting the nature of God Himself.”
15. The statement goes on to say that “non-marital sexual intimacy, homosexual sexual intimacy and same sex relationships, and gender identification that is incongruent with one’s birth sex are all violations of biblical teaching from which Moody derives its community standards.”
16. I did not consider MBI’s stance towards LGBTQ+ students at the time I decided to attend as I was not out, even to myself, yet.
17. My early years at MBI were a positive experience for me. It felt safe and like home.
18. I lived on campus in the dorms for three years.
19. However, two years after starting at MBI, I began to come out as lesbian to close friends and family.
20. A majority of the reactions I received from my peers at MBI were negative.
21. When I posted pro-LGBTQIA+ content on social media, I began hearing that students were reacting negatively to my sexual identity. I also had students begin asking me to defend my sexuality and telling me that they thought my identity was wrong and sinful.
22. I ended up on the radar of the school’s administration in Spring of 2018. MBI’s initial concern was that I attended the Women’s March, which was not an approved event by MBI administration.
23. I was required to meet with a member of MBI administration often. I realize now that the purpose of these meetings was to enable the school to monitor me.
24. On some occasions, other MBI students would turn me into the administration for my LGBTQ+ related postings.
25. I had a total of approximately ten meetings with one particular MBI administrator. They often expressed concerns about my online posts, my relationship status, and other problems the administration had with my sexual identity.
26. I received anonymous hate mail during this time telling me that I should be ashamed of myself for coming out as lesbian.
27. I found myself in an environment that actively hated me and wanted me gone.
28. I felt like I was in survival mode every day.
29. Attending MBI, which had felt safe and supportive before I came out, had become a place of fear that had turned against me.
30. The same people who supported me in my mental health journey, turned their back on me after I came out and said hurtful things to me that harmed my mental health.
31. I felt isolated and alone.

32. While all of this was happening at MBI, the head pastor and associate pastor of my church sat me down and told me that I was wrong for who I was and for exploring my sexuality.
33. It felt like God telling me there was something wrong with me.
34. In fall of 2019, I received an official warning from MBI's Dean of Student Life about a social media post where I said I was a lesbian.
35. I had been turned in this time by a faculty member.
36. Exhibit A is a copy of that official warning letter from MBI.
37. In the letter, the Dean informed me that I was "being placed on Warning Status through the remainder of the semester" and that my behavior was "dangerously close to the probationary level."
38. The letter also stated that my Warning Status was MBI's "way of indicating to you our disapproval of your actions and giving you fair warning that further unwise behavior on your part will result in you being subject to more stringent disciplinary measures."
39. The Dean went on to say "Megan, during this period of time I will expect that you appropriately align yourself with the policies governing student life and am hopeful that there will be no more need for disciplinary measures."
40. Because of this warning, I agreed to remove the post where I described myself as a lesbian and to no longer make social media posts about my sexuality or LGBTQ+ issues.
41. At this point, my anxiety came back in force. I did not want to get out of bed. I was scared of running into an administrator on my way to class.
42. I followed my agreement with MBI to no longer post about my sexuality or LGBTQ+ issues until the spring of 2020, when I had finished all my classes and was awaiting graduation. At that time, I posted about an LGBTQ+ event I attended in New York.
43. MBI saw this post and threatened to prevent me from graduating because of it, even though I had finished all my course work and was no longer living on campus.
44. According to MBI, several professors expressed concern about my being allowed to graduate and approached the school's administration. The concern was that they did not want MBI's reputation tainted by having a known lesbian graduate.
45. The result from this was that, less than a week before graduation, I had to defend why I deserved to get a diploma.
46. Two MBI administrators grilled me about my relationship status, sexual history and asked whether I would date women after graduation.
47. The process was humiliating.
48. It was clear during this meeting that I would not get my diploma unless the answers I gave to their questions aligned with MBI's policies about sexuality and marriage. Because I had been placed in an impossible situation and my hard earned degree was on the line, I told MBI that I agreed with their non-affirming policies and planned to live according to them. As a result, MBI allowed me to receive my diploma.

49. It was as if MBI put on one final show of shaming to satisfy the people at MBI who wished I had never been there.
50. I graduated in May 2020 with a B.A. in Human Services through the counselling program.
51. However, I was so traumatized from this experience, that for several months after graduation, I was scared to do anything that would upset Moody.
52. I cannot imagine ever finding myself in as abusive and manipulative of an environment as I did at Moody.
53. I felt so unsafe, unsupported, and unprotected by my peers, MBI staff, and administration. MBI's policies on sexuality, dating and marriage contributed to this sense of fear and vulnerability.
54. I literally had nowhere on campus to turn to for help with the harassment and discrimination I was experiencing.
55. The majority of my peers and staff on MBI's campus regularly participated in and perpetuated ideas of queerphobia. I would have to face this queerphobia in classes, in casual conversations, and in direct comments.
56. During the time that I was out on MBI's campus, my depression and anxiety became very severe. I had regular appointments with a therapist and psychiatrist during this time so that I could cope and heal from the homophobia I dealt with on a daily basis. I experienced panic attacks, inability to get out of bed, insomnia, and suicidal thoughts. I graduated a year later than planned because I had to withdraw from some classes for mental health reasons.
57. I was not forced to participate in conversion therapy, but during my meetings with MBI administration it was strongly encouraged that I meet with Christian leaders to work through my sexual identity issues. This would essentially be a "softer" form of conversion therapy.
58. Other queer students at MBI have been turned in by other students after disclosing their sexuality. Some of these students have been forced into counselling or required to meet with a professor.
59. I am participating in this lawsuit for two reasons. One is that I want justice for myself and for other LGBTQIA+ students who have been harmed by government-funded religious schools. The other reason is that I want to prevent further harm to LGBTQIA+ students on these campuses.
60. I am a federal income taxpayer in the United States. I received grants from the U.S. Department of Education to attend Moody Bible Institute.
61. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 24th day of March, 2021.

By:   
Megan Steffen (Mar 24, 2021 19:17 CDT)

Megan Steffen

Megan Steffen

# Megan Steffen Declaration

Final Audit Report

2021-03-25

Created:	2021-03-24
By:	Lauren Swain (lauren@paulsouthwick.com)
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